

# EXHIBIT 8

FILED UNDER SEAL

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**USAMA JAMIL HAMAMA**, et al.,

Petitioners/Plaintiffs,

v.

**REBECCA ADDUCCI**, et al.,

Respondents/Defendants.

Case No. 2:17-cv-11910  
Hon. Mark A. Goldsmith  
Mag. David R. Grand

Class Action

**DECLARATION OF AZIZ KATTOULA**

I, Aziz Kattoula, declare as follows:

1. I, Aziz Kattoula, currently am being detained at the Stewart Detention Facility in Lumpkin, Georgia. I have been here for over two weeks.
2. On or about May 21, 2018, I was transferred from the Youngstown facility Ruby Core Civic to Stewart Detention Center.
3. At about 2:00 am in the morning, Core Civic woke me up. They told me I leaving. They did not tell me where. The transport told me we're going to the airport. They drove me to the back of the airport where there was a cargo plane. At that point, I started freaking out because there was only one place and there were two ICE officers and I thought they were sending me to Iraq. They put me in

shackles from transport to the airport. The transport said I was good and didn't need shackles.

4. Back in Youngstown, they took my belongings and brought them with me to the airport. At the airport ICE told me that I couldn't take any of that stuff so they told me they were going to throw it away. They let me take my books and clothes, but nothing else.

5. At that point, ICE went to purchase tickets from Delta, and it was only then that I was not being sent to Iraq.

6. We left Youngstown at about 4:30 or 5:00 am and arrived at the Cleveland airport at about 6:00 am.

7. ICE purchased tickets to Atlanta. They were polite but did not give me any information. They went with me on the plane. When we reached Atlanta, we got off the plane. The ICE officers turned me over to two other ICE officers, who put me in an SUV and took me to an ICE holding facility about one hour from the airport.

8. The conditions there were horrible. It was a big building. They put me in a room with other Iraqis, waiting for other Iraqis to come. Eventually there were about thirty of us in that room which was a big room.

9. We had to beg for toilet paper. We had to beg for food. They were eating in front of us. It seemed like they were taunting us. We said, hey, we've been here

for over 12 hours, you need to feed us. They said sorry, we don't have a kitchen here. We asked for water, they said do you see any water here?

10. They were allowing the Spanish speakers to make calls but we couldn't do that.

11. At one point, a couple of guys started to swear at a black officer who was eating. They called her a bad name, but they were hungry. They segregated those two, and then called a supervisor and then gave the rest of us food but made the other two wait. One of the two who was segregated was named F[REDACTED]. The other was R[REDACTED]. They put each of them in a separate room.

12. We were held there for at least 12 hours, because by the time they put us in a big bus it was nighttime. There were 20-30 people.

13. It was even worse when we got to Stewart. This facility is horrible. The toilets are not cleaned at all.

14. We were all kept in a big room. Both the Iraqis as well as other detainees, while we were processed. We had to sleep on cardboard boxes. We had to step over each other to move around on the go to the bathroom.

15. We did not get into our pods until 8:00 pm on May 22, 2018.

16. The processing took forever, under horrible, inhumane conditions. They gave us bag lunches with bologna and cheese sandwiches.

17. It was so filthy there that without permission, I went to the closet and got out a mop, spray, and a rag and cleaned the toilet because it smelled horrible.

18. I believe I met with the consul on May 24, 2018 in the morning. There were two gentlemen from the consulate and an ICE agent in the next room, the guy with glasses.

19. The consular officer said, you know why you're here. We're trying to get your travel documents. Do you want to go back to Iraq?

20. I told him, no, I don't want to go because I have no one there.

21. [REDACTED] I came here when I was fourteen years old. I later got a student visa and later got my LPR residency. My family didn't want me to go back to Iraq because I would have had to join Saddam's army. Later, my family joined me in the United States around 1987-1988. I don't remember exactly.

22. Well, the consul said I suggest that you sign because in three months, whether you sign or not, they are going to deport everyone. ICE did not say anything that day when I refused to sign but the next day, ICE called the five people were not willing to sign, and the guy with the glasses he was from Washington, DC, and asked us why we were not willing to sign I told him I didn't have anyone in Iraq. He told me that he understands why I was unwilling to sign

but that eventually they were going to deport me and that I would be sitting in jail until they did, so it would be better if I just signed.


23. I told him, we'll see what happens. You've got to do what you've got to do.

24. The five of us included H[REDACTED], A[REDACTED]-A[REDACTED], S[REDACTED], S[REDACTED], and myself.

25. My lawyer's name is Fatin Shuker: [REDACTED].

I, Aziz Kattoula, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 6-6-2018.

  
Signature